

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INEOS FLUOR AMERICAS LLC,

Plaintiff,

V.

HONEYWELL INTERNATIONAL INC.,

Defendant.

C.A. No. 06-189-SLR

**APPENDIX OF EXHIBITS CITED IN LUCITE INTERNATIONAL'S
ANSWERING BRIEF IN OPPOSITION TO HONEYWELL'S MOTION
TO COMPEL DOCUMENTS FROM LUCITE INTERNATIONAL**

VOLUME II

YOUNG CONAWAY STARGATT & TAYLOR, LLP
C. Barr Flinn (#4092) [bflinn@ycst.com]
Karen L. Pascale (#2903) [kpascale@ycst.com]
Chad S.C. Stover (#4919) [cstover@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

- and-

AXINN, VELTROP & HARKRIDER LLP
Richard S. Order [rso@avhlaw.com]
Mark D. Alexander [mda@avhlaw.com]
Aaron C. Brinkman [acb@avhlaw.com]
Elizabeth T. Timkovich [ett@avhlaw.com]
90 State House Square
Hartford, CT 06103
(860) 275-8100

Attorneys for Non-party Lucite International

May 29, 2007

The following exhibit is contained in this Appendix:

Exhibit C: Transcript of Ron Coyle Deposition, Feb. 28, 2007 (pp. 1
and 15-17).

CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on May 29, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Kurt M. Heyman [kheyman@proctorheyman.com]
Patricia L. Enerio [penerio@proctorheyman.com]
PROCTOR HEYMAN LLP
1116 West Street
Wilmington, DE 19801

Martin P. Tully [mtully@nmat.com]
Jason A. Cincilla [jcincilla@mnat.com]
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899

I further certify that on May 29, 2007, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

By E-Mail

Yosef J. Riemer [yriemer@kirkland.com]
Andrew R. Dunlap [adunlap@kirkland.com]
KIRKLAND & ELLIS LLP
153 East 53rd Street
New York, NY 10022

Mark L. Kovner [mkovner@kirkland.com]
Michael S. Becker [mbecker@kirkland.com]
KIRKLAND & ELLIS LLP
655 Fifteenth Street, NW
Suite 1200
Washington, DC 20005

/s/ Karen L. Pascale

Karen L. Pascale (#2903) [kpascale@ycst.com]
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

Attorneys for Non-party Lucite International

EXHIBIT C

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 INEOS FLUOR AMERICAS LLC, *

4 Plaintiff, *

vs. *

5 *****

6 HONEYWELL INTERNATIONAL, INC., *

7 Defendant. *

Case Number
06-189 (SLR)

COPY

8

9

VIDEO DEPOSITION OF
RON COYLE

10

11

Taken on behalf of the Defendant
Wednesday, February 28, 2007
8:30 a.m. CST

12

At the Mobile Marriott, 3101 Airport Boulevard
Mobile, Alabama 36606

13

14 ON BEHALF OF THE PLAINTIFF:

AXINN, VELTROP & HARKRIDER LLP

15 90 State House Square

Hartford, CT 06103

16 (860) 275-8100

BY: Richard S. Order, Esq.

17

ON BEHALF OF THE DEFENDANT:

18 KIRKLAND & ELLIS LLP

1201 North Market Street

19 P.O. Box 1347

Wilmington, DE 19899

20 (302) 658-9200.

BY: Michael D. Reisman, Esq.

21

ALSO PRESENT:

22 John Pacillo, Ineos Fluor

Rose Dominguez, Videographer

23

REPORTER: L. Alan Peacock, AL-CSR-160, RMR, CRR

24 BAY AREA REPORTING-- Certified Court Reporters

2101 Government Street Mobile, Alabama 36606

25 (251)473-1016

1 agreement?

2 A Yes, I do.

3 Q Are you prepared to testify about that
4 knowledge?

5 A Yes, I am.

6 Q And do you have personal knowledge of the
7 history of Ineos's supply relationship with
8 Honeywell?

9 A You mean, do I know some of it? I know
10 some of the history.

11 Q Do you have personal knowledge of that
12 history?

13 A I know some of the history, yes. I know
14 the history when I was involved with the business.

15 Q Are you prepared to testify about the
16 history that you're knowledgeable about?

17 MR. ORDER: Objection to the form.

18 Q (By Mr. Reisman) You can answer.

19 A Yes.

20 Q You can put that one aside.

21 Now I'm just going to ask you a few
22 questions about Ineos Phenol.

23 Ineos Phenol, Incorporated, that's an
24 American corporation, right?

25 A There's no Ineos Phenol, Incorporated.

1 Ineos Phenol is a division of Ineos Americas, LLC.

2 Q And where is Ineos Americas, LLC,
3 headquartered?

4 A Here in Mobile, Alabama.

5 Q And what is your position today with Ineos
6 Americas, LLC?

7 A I'm the vice president of -- for the
8 Phenol division of Ineos Americas, LLC, I'm the vice
9 president of marketing and sales.

10 Q And what other divisions does Ineos
11 Americas, LLC, have?

12 A I'm not exactly sure. I think it's -- I
13 think the -- there's Ineos Oxide, Ineos Silicas, and
14 Ineos Phenol. And I'm not sure we have gone through
15 a restructuring, so I'm not sure which other
16 businesses are under Ineos Americas LLC.

17 Q And what are your responsibilities as vice
18 president of marketing and sales?

19 A I'm responsible for the marketing and
20 sales of phenol and acetone.

21 Q Does Ineos Americas LLC have a parent
22 corporation?

23 A Yes.

24 Q And what is the name of it?

25 A I'm not exactly sure, to be honest with

1 you.

2 Q Are you aware of the relationship between
3 Ineos Americas, LLC, and Ineos Group Holdings PLC.

4 A Yes. I believe that's the parent company,
5 but I'm not sure.

6 Q Do you have -- in your current position,
7 do have you contact with anyone from Ineos Group
8 Holdings, LLC -- PLC?

9 A We have gone through several
10 reorganizations, so I'm not exactly sure who the
11 officers are of that organization. I would imagine
12 I do, but I can't say for sure.

13 Q In your position today, do you have
14 contact with anyone from the Fluor division of Ineos
15 Americas, LLC?

16 A No, not on a business basis.

17 MR. ORDER: Objection to the form. It's
18 misstating his prior testimony.

19 Q (By Mr. Reisman) Do you have contact in
20 your current position with Mr. Pacillo?

21 THE WITNESS: In my current position, no.

22 Q (By Mr. Reisman) When was the last time
23 you had, on a professional basis, contact with
24 Mr. Pacillo?

25 A I don't remember. It was -- on a